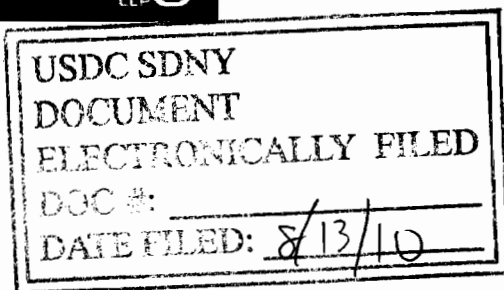


Saul Ewing
LLP



So ordered. The
parties are permitted to
file motion papers in accordance
with Cantor Fitzgerald's proposed
sealing and redaction logs.

Jennifer L. Beidel

Phone: (215) 972-7850

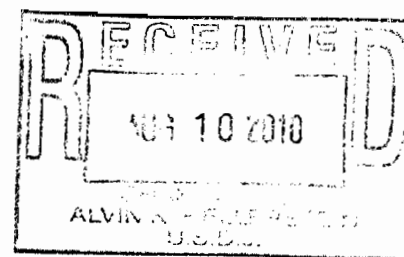
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JBeidel@saul.com

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August 9, 2010

August 13, 2010



VIA HAND DELIVERY

Honorable Alvin K. Hellerstein
United States District Judge
United States Courthouse
500 Pearl Street, Room 1050
New York, New York 10007

Re: *In re September 11 Litigation*
21 MC 101 (AKH)

Dear Judge Hellerstein:

The undersigned counsel represents and submits this letter on behalf of the Cantor Fitzgerald Plaintiffs.¹ Per Your Honor's request, enclosed please find the following documents:

- (i) Cantor Fitzgerald Plaintiffs' Proposed Redaction Log Regarding Defendants American Airlines, Inc. and AMR Corporation's Motion *in Limine* and for Partial Summary Judgment;
- (ii) Cantor Fitzgerald Plaintiffs' Proposed Sealing Log Regarding Defendants American Airlines, Inc. and AMR Corporation's Motions *in Limine* and for Partial Summary Judgment
- (iii) Proposed redacted version of the Memorandum of Law in Support of the Motion *in Limine* of Defendants American Airlines, Inc. and AMR Corporation to Exclude Plaintiff Cantor Fitzgerald's Proffered Expert Report on Damages;

¹ The Cantor Fitzgerald Plaintiffs are Cantor Fitzgerald & Co., Cantor Fitzgerald Associates, L.P., Cantor Fitzgerald Brokerage, L.P., Cantor Fitzgerald Europe, Cantor Fitzgerald International, Cantor Fitzgerald Partners, Cantor Fitzgerald Securities, Cantor Fitzgerald L.P., Cantor Index Limited, CO2e.com, LLC, eSpeed, Inc., eSpeed Securities, Inc., eSpeed Government Securities, Inc., and Trademark, L.P.

August 9, 2010

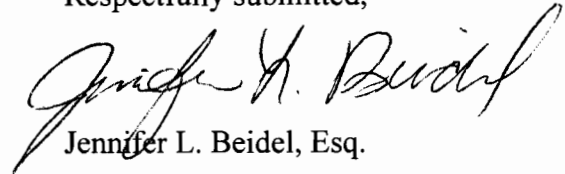
Page 2

- (iv) Proposed redacted version of the Memorandum of Law in Support of the Motion of Defendants American Airlines, Inc. and AMR Corporation for Partial Summary Judgment Dismissing Cantor Fitzgerald's Claims for Business Damages Resulting from the Deaths of its Employees; and
- (v) Proposed redacted version of Defendants' Statement of Undisputed Facts Pursuant to Local Rule 56.1.

The undersigned counsel has conferred with counsel for Defendants American Airlines, Inc. and AMR Corporation. Defendants take no position with respect to the proposed redactions and sealing requests made by the Cantor Fitzgerald Plaintiffs.

Thank you for your consideration.

Respectfully submitted,



Jennifer L. Beidel, Esq.

cc: Desmond T. Barry, Esquire
Robert A. Clifford, Esquire
Timothy S. Tomasik, Esquire

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

IN RE SEPTEMBER 11TH 2001 PROPERTY
DAMAGE AND BUSINESS LOSS
LITIGATION

Cantor Fitzgerald & Co., et al.,

Plaintiffs,

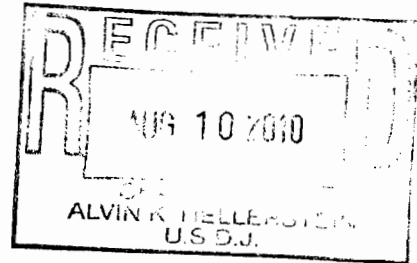
v.

American Airlines, Inc., et al.,

Defendants.

21-MC-101 (AKH)

04-CV-07318 (AKH)



**CANTOR FITZGERALD PLAINTIFFS'¹ PROPOSED SEALING LOG REGARDING
DEFENDANTS AMERICAN AIRLINES, INC. AND AMR CORPORATION'S
MOTIONS *IN LIMINE* AND FOR PARTIAL SUMMARY JUDGMENT**

Memorandum of Law in Support of Motion *in Limine*

Exhibit	Reason for Sealing
Exhibit A	Private governmental submission
Exhibit B	Confidentially designated deposition transcript
Exhibit C	Confidentially designated expert report
Exhibit D	Confidentially designated loss calculation model
Exhibit H	Confidentially designated expert calculations

¹ The Cantor Fitzgerald plaintiffs are Cantor Fitzgerald Securities, Cantor Fitzgerald & Co., Cantor Fitzgerald International, Cantor Fitzgerald Partners, eSpeed, Inc. Cantor Fitzgerald Associates, L.P., Cantor Fitzgerald Brokerage, L.P., Cantor Fitzgerald Europe, Cantor Index Limited, eSpeed Government Securities, Inc., eSpeed Securities, Inc., TradeSpark, L.P., CO2e.com, LLC, and Cantor Fitzgerald L.P.

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

IN RE SEPTEMBER 11TH 2001 PROPERTY
DAMAGE AND BUSINESS LOSS
LITIGATION

21-MC-101 (AKH)

Cantor Fitzgerald & Co., et al.,

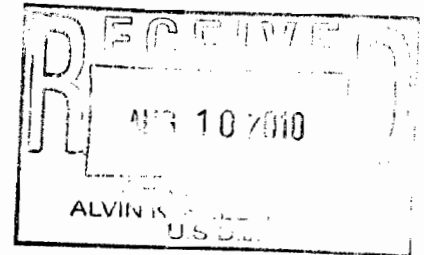
Plaintiffs,

v.

American Airlines, Inc., et al.,

Defendants.

04-CV-07318 (AKH)



**CANTOR FITZGERALD PLAINTIFFS'¹ PROPOSED REDACTION LOG
REGARDING DEFENDANTS AMERICAN AIRLINES, INC. AND AMR
CORPORATION'S MOTIONS *IN LIMINE* AND
FOR PARTIAL SUMMARY JUDGMENT**

Memorandum of Law in Support of Motion *in Limine*

Page and Line	Reason for Redaction
Page 2 lines 3 and 4 – partial sentence	References to confidential deposition
Page 2 line 6 through Page 3 line 1 – two sentences	Quotation from confidential deposition and report
Page 2 Footnote 4 – parentheticals on lines 2 through 5	Quotation from confidential deposition
Page 2 Footnote 5 – parenthetical on lines 2 through 4	Quotation from confidential report
Page 3 Footnote 6 – parentheticals on lines 1 through 8	Quotation from confidential deposition
Page 3 Footnote 7 – parentheticals on lines 1 and 2	Quotation from confidential deposition

¹ The Cantor Fitzgerald plaintiffs are Cantor Fitzgerald Securities, Cantor Fitzgerald & Co., Cantor Fitzgerald International, Cantor Fitzgerald Partners, eSpeed, Inc. Cantor Fitzgerald Associates, L.P., Cantor Fitzgerald Brokerage, L.P., Cantor Fitzgerald Europe, Cantor Index Limited, eSpeed Government Securities, Inc., eSpeed Securities, Inc., TradeSpark, L.P., CO2e.com, LLC, and Cantor Fitzgerald L.P.

Page and Line	Reason for Redaction
Page 4 Footnote 8 – parenthetical on lines 1 and 2	Quotation from confidential deposition
Page 5 – dollar figures on lines 2 and 3, 6 and 7, 9, and 11	Calculations from confidential report
Page 5 Footnote 14 – parenthetical on lines 4 and 5	Quotation from confidential report
Page 5 Footnote 15 – quotation in lines 1 through 4 and parenthetical on lines 4 and 5	Quotation from confidential deposition and report
Page 6 lines 4 and 5 – end of sentence	Characterization of confidential deposition
Page 6 line 7 – end of sentence	Characterization of confidential deposition
Page 6 Footnote 16 – parenthetical on lines 1 and 2	Quotation from confidential deposition
Page 6 Footnote 17 – six percentage figures on lines 1, 2, 5, and 6	Calculations from confidential report
Page 6 Footnote 18 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 6 Footnote 20 – parenthetical on lines 3 through 7	Quotation from and characterization of confidential deposition
Page 7 lines 5 through 11 – four sentences	References to confidential report and deposition
Page 7 Footnote 21 – parenthetical on lines 1 through 3	Quotation from confidential deposition
Page 7 Footnote 23 – parentheticals on lines 1 through 6	Quotation from confidential deposition
Page 7 Footnote 26 – parenthetical on lines 2 through 4	Quotation from confidential report
Page 7 Footnote 27 – parenthetical on lines 4 through 6 and three dollar figures in lines 1 through 3	Quotation and calculations from confidential report
Page 8 lines 1 through 3 – one sentence	Quotation from confidential deposition
Page 8 – parenthetical on line 5	Improper reference to confidential mediation
Page 8 lines 7 through 13 – three sentences	Quotation from confidential deposition
Page 8 Footnote 28 – parenthetical on lines 1 through 3	Quotation from confidential deposition
Page 8 Footnote 29 – parenthetical on lines 3 through 4	Improper reference to confidential mediation
Page 8 Footnote 31 – parentheticals on lines 1 through 7	Quotation from confidential deposition
Page 9 lines 3 through 5 – one sentence	Quotation from confidential deposition

Page and Line	Reason for Redaction
Page 9 lines 8 through 11 – one sentence	Quotation from confidential deposition
Page 9 Footnote 32 – parenthetical on lines 1 and 2	Quotation from confidential deposition
Page 9 Footnote 34 – parenthetical on lines 1 through 4	Quotation from confidential deposition
Page 15 lines 10 through 13 – one sentence	Quotation from confidential deposition
Page 16 Footnote 39 – percentages and dollar figures on lines 2 and 3	Calculations from confidential report

Memorandum of Law in Support of Motion for Partial Summary Judgment

Page and Line	Reason for Redaction
Page 2 Footnote 3 – parentheticals on lines 2 through 7	Quotation from confidential deposition
Page 3 Footnote 4 – parenthetical on lines 1 and 2	Quotation from confidential deposition
Page 3 Footnote 5 – parentheticals on lines 1 through 8	Quotation from confidential deposition
Page 3 Footnote 7 – parenthetical on lines 5 and 6	Quotation from confidential report
Page 5 lines 11 through 22 – block quote	Quotation from confidential report
Page 6 lines 1 through 4 – one sentence	Quotation from confidential report
Page 7 lines 9 through 22 – block quote	Quotation from private governmental submission
Page 8 – dollar figure on line two	Calculations from confidential report
Page 8 lines 7 through 18 – three bullet points	Quotation from confidential report and deposition
Page 9 lines 5 through 8 – block quote	Quotation from confidential deposition
Page 9 lines 10 through 11 – one sentence	Quotation from confidential deposition
Page 9 – dollar figures on lines 12 through 14	Calculation from confidential report
Page 16 lines 15 and 16 – one sentence	Quotation from confidential deposition
Page 16 lines 17 and 18 – one sentence	Quotation from private governmental submission
Page 16 Footnote 35 – dollar figures on line 2	Calculation from confidential report
Page 16 Footnote 36 – dollar figures on lines 1 and 2	Calculation from confidential report
Page 17 – dollar figure on line 11	Calculation from confidential report
Page 17 Footnote 39 – dependent clause of second sentence on lines 1 and 2	Improper reference to confidential mediation
Page 17 Footnote 41 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 17 Footnote 42 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 18 lines 1 through 4 – two sentences	Quotation from confidential deposition

Page and Line	Reason for Redaction
Page 18 – five percentages and dollar figures on lines 5, 6, 11, and 12	Calculations from confidential report
Page 18 Footnote 43 – parenthetical on lines 1 through 4	Quotation from confidential report
Page 18 Footnote 44 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 18 Footnote 45 – parentheticals on lines 1 through 3	Quotation from confidential deposition
Page 18 Footnote 47 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 19 – two percentages on lines 1 and 2	Calculations from confidential report
Page 19 lines 11 and 12 – one sentence	Quotation from confidential deposition
Page 19 – two percentages on lines 13 and 14	Calculations from confidential report
Page 19 Footnote 51 – parentheticals on lines 1 through 5	Quotation from confidential deposition and report
Page 19 Footnote 53 – parenthetical on lines 1 through 3	Quotation from confidential deposition
Page 20 – two percentages and dollar figures on line 1	Calculations from confidential report
Page 20 lines 3 through 7 – four sentences	Quotation from confidential deposition
Page 20 – one dollar figure on line 16	Calculations from confidential report
Page 21 – one dollar figure on line 7	Calculations from confidential report
Page 21 lines 9 through 11 – one sentence	Quotation from confidential deposition
Page 21 Footnote 62 – parenthetical on lines 1 through 3	Quotation from confidential deposition
Page 21 Footnote 63 – parentheticals on lines 1 through 4	Quotation from confidential deposition
Page 21 Footnote 66 – parentheticals on lines 1 through 5	Quotation from confidential deposition
Page 21 Footnote 67 – parentheticals on lines 1 through 8	Quotation from confidential deposition
Page 22 lines 2 and 3 – one sentence	Quotation from confidential deposition
Page 22 – dollar figure on line 12	Calculations from confidential report
Page 22 Footnote 68 – parenthetical on lines 1 through 3	Quotation from confidential deposition

Page and Line	Reason for Redaction
Page 22 Footnote 69 – parenthetical on lines 1 through 4	Quotation from confidential deposition
Page 22 Footnote 70 – third sentence on lines 4 through 7 and parenthetical on lines 8 and 9	Quotations from confidential deposition

Undisputed Statement of Facts in Support of Motion for Partial Summary Judgment

Page and Line	Reason for Redaction
Page 1 Paragraph 1 – quotation on lines 2 through 4	Quotation from confidential report
Page 2 Paragraph 2 – quotation on lines 1 through 7	Quotation from confidential report
Page 2 Paragraph 3 – quotations on lines 1 through 7	Quotation from confidential report
Page 2 Paragraph 4 – quotation on lines 2 and 3	Quotation from confidential report
Page 2 Paragraph 5 – quotation on lines 1 through 5	Quotation from confidential deposition
Page 3 Paragraph 6 – quotation on lines 1 through 5	Quotation from confidential report
Page 3 Paragraph 7 - quotation and parenthetical on lines 1 through 8	Quotation from confidential deposition
Page 6 Paragraph 14 – quotations on lines 3 through 7	Quotation from confidential deposition
Page 12 Paragraph 33 – quotation on lines 2 and 3	Quotation from confidential report
Page 12 Paragraph 34	Improper reference to confidential mediation report
Page 12-13 Paragraph 35 – five dollar figures on lines 6, 9, 10, and 11	Calculations from confidential report
Page 13 Paragraph 38 – five dollar figures on lines 1, 4, 5, and 6	Calculations from confidential report
Page 13-14 Paragraph 39 – three dollar figures on lines 2 through 4	Calculations from confidential report
Page 14 Paragraph 40 – dollar figure on line 1 and parenthetical on lines 4 through 7	Calculations and quotation from confidential report
Page 14 Paragraph 41 – two dollar figures on line 3	Calculations from confidential report
Page 15 Paragraph 45 – dollar figure on line 2	Calculations from confidential report
Page 15 Paragraph 46 – quotation on line 3 and second word on line 1	Quotation from and reference to confidential deposition
Page 16 Paragraph 47 – parentheticals on lines 2 through 9	Quotation from confidential deposition
Page 16 Paragraph 48 – parenthetical on lines 4 through 7	Quotation from private governmental submission
Page 17 Paragraph 52 – two dollar figures on lines 2 and 3	Calculations from confidential report
Page 18 Paragraph 54 – quotation on lines 1 through 4	Quotation from confidential deposition and report

Page and Line	Reason for Redaction
Page 18 Paragraph 55 – parenthetical on lines 3 through 5	Quotation from confidential deposition
Page 18 Paragraph 56 – quotation on lines 3 and 4	Quotation from confidential deposition
Page 18 Paragraph 57 – parenthetical on line 5	Quotation from confidential deposition
Page 19 Paragraph 58 – parentheticals on lines 3 through 6	Quotations from confidential deposition
Page 19 Paragraph 60 – quotations on lines 2 through 5	Quotations from confidential deposition
Page 19 Paragraph 61 – three percentages on lines 2 and 3	Calculations from confidential report
Page 20 Paragraph 62 – quotation on lines 3 and 4	Quotation from confidential deposition
Page 20 Paragraph 63 – dollar figure on line 2 and quotations on lines 3 through 9	Calculations from confidential report and quotations from confidential deposition
Page 20 Paragraph 64 – three percentages on lines 3 through 5	Calculations from confidential report
Page 21 Paragraph 66 – dollar figure on line 2	Calculations from confidential report
Page 21 Paragraph 69 – quotation on lines 1 through 4	Quotation from confidential report
Page 21 Paragraph 70 – parenthetical on lines 3 through 5	Quotation from confidential deposition
Page 22 Paragraph 72 – quotation on lines 1 and 2	Quotation from confidential report
Page 22 Paragraph 73 – two percentages on line 2	Calculations from confidential report
Page 22 Paragraph 74 – percentage on line 2 and quotation on lines 3 through 6	Calculations from confidential report and quotation from confidential deposition
Page 23 Paragraph 76 – dollar figure on line 1	Calculations from confidential report
Page 23 Paragraph 78 – quotation on lines 1 and 2	Quotation from confidential deposition
Page 23 Paragraph 79 – parenthetical on lines 2 through 5	Quotation from confidential deposition
Page 23 Paragraph 80 – clause on line 2	Reference to confidential deposition
Page 23 Paragraph 81 – dollar figure on line 2	Calculations from confidential report
Page 24 Paragraph 83 – quotation on lines 2 through 6	Quotation from confidential deposition
Page 25 Paragraph 86 – quotation on lines 3 through 7	Quotation from confidential deposition

Page and Line	Reason for Redaction
Page 25 Paragraph 87 – quotation and parentheticals on lines 2 through 6	Quotation from confidential deposition
Page 26 Paragraph 88 – parenthetical on lines 11 through 14	Quotation from confidential deposition
Pages 26-27 Paragraph 90 – quotation and parentheticals on lines 1 and 3 through 10	Quotation from confidential deposition
Page 27 Paragraph 91 – parentheticals on lines 4 through 16	Quotation from confidential deposition
Page 27-28 Paragraph 92 – quotation and parenthetical on lines 3 through 6	Quotation from confidential deposition
Page 28 Paragraph 93 – dollar figure on line 1	Calculations from confidential report